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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CRAIG GAMBLE, MICHAEL SIMMONS,
RICHARD CALDWELL, KATHY
BELMONTE, MARIA HIGH, and
SALVADOR HERNANDEZ, individually on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

BOYD GAMING CORPORATION, a Nevada
corporation; DOES I through V, inclusive; and
ROE corporations I through V, inclusive,

Defendant.

Consolidated Case Nos.:

2:13-cv-1009-JCM-PAL;
2:13-cv-01043-JCM-PAL;
2:13-cv-01801-JCM-PAL.

**STIPULATION TO STAY DEADLINES
AND [PROPOSED] ORDER**

(Fifth Request)

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This stipulation is entered into by and between Plaintiffs Craig Gamble, Michael Simmons, Richard Caldwell, Kathy Belmonte, and Maria High, individually and on behalf of similarly situated employees ("Plaintiffs") and Defendant Boyd Gaming Corporation ("Defendant") (collectively "the parties") in the above-captioned consolidated actions by and through their attorneys of record:

I) THE PARTIES' SETTLEMENT & STIPULATION TO VACATE ALL PENDING DATES

WHEREAS, the parties met before a qualified third-party neutral in Los Angeles, California on Tuesday, April 7, 2015, to engage in good faith settlement discussions;

WHEREAS, at day's end, the parties reached a settlement agreement on all material terms, signing a memorandum of understanding they agreed is binding and enforceable and admissible to enforce its terms;

WHEREAS, as reflected in the memorandum of understanding, Plaintiffs agreed to file their motion for preliminary approval of the settlement no later than May 7, 2015; and

WHEREAS, as reflected in the memorandum of understanding, the parties agreed, subject to court approval, to stay the litigation pending the Court's evaluation of the settlement.

NOW, THEREFORE, pursuant to Local Rule 6-1, it is hereby stipulated and agreed by and between the parties that good cause exists to vacate all dates and deadlines currently set in the action. Plaintiffs will file their motion for preliminary approval no later than May 7, 2015.

II) PREVIOUS MODIFICATIONS TO THE SCHEDULING ORDER

In compliance with Local Rule of Civil Procedure 6-1, the parties submit the following information regarding previous extensions granted in the case:

WHEREAS, on December 26, 2013, the Court approved the parties' stipulation proposing revised scheduling dates, (ECF No. 50);

WHEREAS, on May 20, 2014, the Court granted the parties' request that the Court vacate the operative deadlines pending the Court's ruling on plaintiffs' motion for conditional certification, (ECF No. 85);

WHEREAS, after the Court ruled on plaintiffs' motion, the Court subsequently adopted

the parties' proposed schedule, (ECF No. 98);

WHEREAS, on January 12, 2015, the Court granted in part Plaintiffs' motion for modification of the scheduling order, (ECF No. 213); and

WHEREAS, in granting Defendant's motion to compel opt-in plaintiff depositions on April 6, 2015, the Court extended the deadline to file dispositive motions by one month, (ECF No. 240).

SO STIPULATED:

Dated: April 9, 2015

NICHOLS KASTER, PLLP

By: /s/Rebekah L. Bailey

REBEKAH L. BAILEY

COGBURN LAW OFFICES

Attorneys for Plaintiffs

Dated: April 9, 2015

MORRISON & FOERSTER LLP

By: /s/Nancy Thomas (with permission)

NANCY THOMAS


KAMER ZUCKER ABBOTT

Attorneys for Defendant

IT IS SO ORDERED.

IT IS FURTHER ORDERED that the parties shall have until May 7, 2015, to file a stipulation to dismiss with prejudice, or a joint status report indicating when the stipulation will be filed.

Dated this 13th day of April, 2015.


Peggy A. Leen
United States Magistrate Judge

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FILER'S ATTESTATION

I, Rebekah L. Bailey, am the ECF user whose identification and password are being used to file this **STIPULATION TO STAY DEADLINES AND [PROPOSED] ORDER**. In compliance with Special Order No. 109, I hereby attest that the other above-named signatory concurs in this filing.

Dated: April 9, 2015

/s/ Rebekah L. Bailey

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PROOF OF SERVICE

I hereby certify that on Monday, April 9, 2015, I caused the following documents to be served:

STIPULATION TO STAY DEADLINES AND [PROPOSED] ORDER;

using the following method:

CM/ECF Filing with the United States District Court of Nevada;

to the following counsel of record:

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Date: April 9, 2015

/s/ Rebekah L. Bailey

Rebekah L. Bailey